

CHARTWELL LAW

One Battery Park Plaza, Suite 701

New York, NY 10004-1445

Telephone: (212) 968-2300

Matthew Burrows (NY ID 4861523)

John J. Winter (*Pro Hac Vice*)

Telephone: (212) 968-2300

(Attorneys for The Chartwell Law Offices LLP)

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK
CIVIL DIVISION**

SHLOMO BRAUN,

Plaintiff,

Case No. 23-7241-cv

v.

Judge

THE CHARTWELL LAW OFFICES, LLP,

Defendant.

NOTICE OF REMOVAL

PLEASE TAKE NOTICE that pursuant to 28 U.S.C. §1441 and 28 U.S.C. §1446, Defendant The Chartwell Law Offices, LLP hereby removes the above-captioned action to this Court from the Supreme Court of the State of New York, New York County.

1. The Chartwell Law Offices, LLP is the Defendant in the civil action brought on August 31, 2023 in the Supreme Court of the State of New York, New York County.

Grounds for Removal

2. This case is removable under 28 U.S.C. §1441(a) because this is a civil action in which the District Courts of the United States have been given original jurisdiction under 28 U.S.C. §1331. Specifically, plaintiff's principal claim for relief concerns the Fair Debt Collections Practices Act, and plaintiff is asserting the right to recover for this on the basis of 15 USC §1692 *et seq.*
3. Plaintiff's Summons and Complaint were served on September 11, 2023. This notice of removal is filed within 30 days of receipt of the Summons and Complaint and is therefore timely under 28 U.S.C. §1446(b).

4. Pursuant to 28 U.S.C. §1446(a), Defendant attaches to this notice the following papers, which are all of the process, pleadings, and orders served on it prior to removal of this action:
- (a) Summons and Complaint, attached hereto as Exhibit A

Dated: September 28, 2023

Respectfully submitted,

By: /s/ Matthew Burrows
Matthew Burrows, Esquire (NY ID 4861523)
One Battery Park Plaza, Suite 701
New York, NY 10004-1445
Telephone: (212) 968-2300
e-mail: mburrows@chartwelllaw.com
and

John J. Winter, Esquire (*Pro Hac Vice*)
970 Rittenhouse Road, Suite 300
Eagleville, PA 19403
Telephone: (610) 666-8437
Telecopier: (610) 666-7704
e-mail: jwinter@chartwelllaw.com

(Attorneys for The Chartwell Law Offices, LLP)

CHARTWELL LAW

One Battery Park Plaza, Suite 701

New York, NY 10004-1445

Telephone: (212) 968-2300

Matthew Burrows (NY ID 4861523)

John J. Winter (*Pro Hac Vice*)

Telephone: (212) 968-2300

(Attorneys for The Chartwell Law Offices LLP)

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK
CIVIL DIVISION**

SHLOMO BRAUN,
Plaintiff,

Case No. 23-7241-cv

v.

Judge

THE CHARTWELL LAW OFFICES, LLP,
Defendant.

CERTIFICATE OF SERVICE

I hereby certify that on September 28, 2023, a copy of the foregoing Notice of Removal was served on the following party by regular United States First Class Mail, postage prepaid, addressed as follows:

Levi Huebner, Esquire
Levi Huebner & Associates, PC
488 Empire Blvd., Suite 100, Brooklyn, NY 11225
Attorney for Plaintiff, Shlomo Braun

I certify that the foregoing statements made by me are true. I am fully aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: New York, NY
September 28, 2023

CHARTWELL LAW

By:

Matthew Burrows, Esq.
One Battery Park Plaza, Suite 701
New York, NY 10004
Tel. (212) 968-2300
Email: mburrows@chartwelllaw.com